

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA,	:	
	:	
Plaintiff,	:	
	:	
-vs-	:	CASE NUMBER 2:24-CR-74
	:	
LAJUANA KELLEY,	:	CHIEF JUDGE SARAH D. MORRISON
	:	
Defendant.	:	
	:	

**DEFENDANT LAJUANA KELLEY'S MOTION
FOR LEAVE TO FILE HER SENTENCING MEMORANDUM UNDER SEAL**

Now comes the Defendant Lajuana Kelley respectfully moving this Court, by and through counsel, for authorization to file her Sentencing Memorandum under seal and to seal all related pleadings.

Respectfully submitted,

FREDERICK D. BENTON, JR.
A Legal Professional Association

/s/ Frederick D. Benton, Jr.
Frederick D. Benton, Jr.
Ohio Supreme Court #0022800
Trial Counsel for Defendant
Lajuana Kelley
98 Hamilton Park
Columbus, Ohio 43203
(614) 732-4693
fred@fdbentonlaw.com

MEMORANDUM IN SUPPORT

Lajuana Kelley awaits sentencing upon her plea to Obstructing, Influencing, and Impeding an Official Proceeding, a violation of 18 U.S.C. §1512(c)(2). An extensive sentencing memorandum has been prepared that discloses and expounds upon sensitive information regarding her personal background.¹ Such information is confidential and protected by applicable Federal law and regulations. See e.g. 42 C.F.R., Part 2; C.F. Local Rule 32.1 and 32.2. There is no overriding public policy to compel disclosure of such information nor is there any legitimate reason to require the same.

Wherefore, this Court is requested to seal Defendant's Sentencing Memorandum and all related pleadings.

Respectfully submitted,

FREDERICK D. BENTON, JR.
A Legal Professional Association

/s/ Frederick D. Benton, Jr.

Frederick D. Benton, Jr.
Ohio Supreme Court #0022800
Trial Counsel for Defendant
Lajuana Kelley
98 Hamilton Park
Columbus, Ohio 43203
(614) 732-4693
fred@fdbentonlaw.com

¹ The Presentence Report also discloses similar information.

CERTIFICATE OF SERVICE

This is to certify that a true copy of the foregoing pleading was delivered by ECF on this the 17th day of January, 2025 to the following:

Kevin Kelley
Nicole Pakiz
UNITED STATES ATTORNEY'S OFFICE
303 Marconi Boulevard, Suite 200
Columbus, Ohio 43215
Kevin.Kelley@usdoj.gov
Nicole.pakiz@usdoj.gov

Devin Sprankel
UNITED STATES PROBATION OFFICE
85 Marconi Boulevard
Columbus, Ohio 43215
Devin_sprankel@ohsp.uscourts.gov

Respectfully submitted,

FREDERICK D. BENTON, JR.
A Legal Professional Association

/s/ Frederick D. Benton, Jr.

Frederick D. Benton, Jr.
Ohio Supreme Court #0022800
Trial Counsel for Defendant
Lajuana Kelley
98 Hamilton Park
Columbus, Ohio 43203
(614) 732-4693
fred@fdbentonlaw.com